

United States District Court
Eastern District of Texas
Sherman Division

Angela Austin

§

§

vs

§ Cause No.
4:11-cv-00075-RAS-DDB

§

LTD Financial Services, LP

§

Original Answer

TO THE HONORABLE JUDGE OF THIS COURT:

The Defendant, LTD Financial Services, LP (referred to hereafter as "LTD"), files this Original Answer and in support thereof would show as follows:

1. LTD can neither admit or deny the allegations in Paragraph 1 of the Complaint for the reason that it is unaware of the purposes for which the indebtedness in question was incurred.
2. LTD can neither admit or deny the allegations in Paragraph 2 of the Complaint for the reason that it is unaware of the purposes for which the indebtedness in question was incurred.
3. In response to Paragraph 3 of the Complaint, LTD states that it does not contest jurisdiction at this time.
4. In response to Paragraph 5 of the Complaint, LTD states that it does not contest venue.
5. In response to Paragraph 5 of the Complaint, LTD states that it admits

to collecting a debt on behalf of Chase Bank. LTD can neither admit or deny the remainder of this Paragraph for the reason that it is unaware of the purposes for which the indebtedness in question was incurred.

6. LTD can neither admit or deny the allegations in Paragraph 6 of the Complaint for the reason that it is unaware of the purposes for which the indebtedness in question was incurred.

7. LTD can neither admit or deny the allegations in Paragraph 7 of the Complaint for the reason that it is unaware of the purposes for which the indebtedness in question was incurred.

8. LTD denies the allegations in Paragraph 8 of the Complaint.

9. LTD denies the allegations in Paragraph 9 of the Complaint.

10. LTD denies the allegations in Paragraph 10 of the Complaint.

11. In response to Paragraph 11 of the Complaint, LTD states that the underlying case was settled for more than was originally discussed. Otherwise the allegations set forth in Paragraph 11 are denied.

12. LTD denies the allegations in Paragraph 12 of the Complaint.

13. LTD denies the allegations in Paragraph 13 of the Complaint including all sub-paragraphs thereof.

14. LTD denies the allegations in Paragraph 14 of the Complaint.

15. LTD denies the allegations in Paragraph 15 of the Complaint including all sub-paragraphs thereof.

16. LTD denies the allegations in Paragraph 16 of the Complaint.

17. LTD denies the allegations in Paragraph 17 of the Complaint.

18. LTD denies the allegations in Paragraph 18 of the Complaint.

WHEREFORE, the Defendant respectfully requests that the Plaintiff take nothing by this suit and for such other and further relief, both at law and in equity, to which the Defendant may be justly and legally entitled.

Respectfully Submitted,

Barron, Newburger & Sinsley PLLC
101 Metro Dr., Suite A
Terrell, Texas 75160
(972) 499-4833
(972) 563-1598 (facsimile)

/s/Ed Walton

Ed Walton

SBN: 20828550

Certificate of Service

This is to certify that a true and correct copy of this instrument was this day forwarded to those persons identified below pursuant to the Court's ECF system:

Bonner C. Walsh
518 East Tyler Street
Athens, TX75751

Signed March 10, 2011.

/s/Ed Walton

Ed Walton